

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

1:19-cr-01631-DHU

**KAMAL BHULA, a.k.a. “Rocky,”
JOHNATHAN CRAFT, a.k.a.
“Jonathan Craft,” a.k.a. “YN,”
a.k.a. “Wayan,”
WILLIE HORTON, EDDIE HILL
and PRAGNESHKUMAR PATEL,
a.k.a. “Pete,”**

Defendants.

**MOTION FOR WITHDRAWAL AS COUNSEL AND
APPOINTMENT OF SUBSTITUTE COUNSEL FOR DEFENDANT CRAFT**

Defendant Jonathan Craft, by and through undersigned counsel, moves the Court to allow undersigned counsel to withdraw her representation. In support of this motion, counsel states:

1. Counsel was appointed on April 21, 2021.
2. Co-counsel, Barry Porter was appointed on April 28, 2021.
3. For personal reasons, which would directly affect undersigned counsel’s ability to adequately represent her client, counsel requests that this Court enter an order allowing counsel to withdraw.
4. Susan Burgess-Farrell, is willing to serve as co-counsel and is familiar with the intricacies of the evidence and witnesses the government proposes to assert.
5. Ms. Burgess-Farrell is familiar with the facts of this case and will be able to proceed as co-counsel for Mr. Porter at the July 17, 2023, trial setting.

6. This withdrawal and substitution of counsel will not cause any delay in this case according to Ms. Burgess-Farrell, Mr. Porter and undersigned counsel.
7. The assigned Assistant United States Attorney Letitia Simms has been contacted and takes no position on this motion given defense counsel's assurances that this substitution will not delay the current trial setting.

WHEREFORE, for the foregoing reasons, undersigned counsel requests that this Court enter an order allowing counsel to withdraw.

Respectfully submitted,



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I hereby certify that a true and correct copy of the foregoing pleading was electronically delivered to all parties via CM/ECF, on May 8, 2023

/s/ Meredith M. Baker
Meredith M. Baker